

REMARKS

The rejection of claims 1 - 23 over Takahashi in view of Chang is respectfully traversed.

Applicants have amended the claims to point out with more clarity the difference with the references. The limitations of claim 1 have been inserted into claims 4 and 5.

With respect to claim 4, Applicants have amended the claim to specify that the hierarchy is one of triggering actions, so that “centering”, the lower action, is within the scope of “passing”, the higher action, the soccer ball. Support is found on page 11, lines 7 - 14.

In contrast, the cited passage in Takahashi (Col 6, lines 25 - 30, Col 9, lines 51 - 67, Col 12, lines 49 - 65) does not relate to claim 4, as amended. The passage in Col 6 merely describes the process of adding ID data to the video, which is not at all a hierarchy of triggering actions. The passage in Col 9 merely elaborates on the passage in Col 6, in which the data are ID data, not a hierarchy of triggering actions. The passage in Col 12 refers to “banner headline”, “head” and “subhead”. These terms are explained above in Col 12, lines 28 - 46, in which the start and end of the recording is the subhead and the date information is the banner headline. This also is not at all like claim 4. Thus, none of the passages cited relate to the method of establishing two indexes based on a hierarchy of trigger actions, with a higher trigger action and its associated index being automatically added to the lower action.

1 With respect to claim 5, Applicants disagree with the Examiner's summary of the
2 Chang abstract. The abstract refers to a number of triggering actions, but not to a
3 composite triggering action composed of two related actions. Support is provided by
4 the last paragraph in page 25; p.11, lines 15 - 20; and p. 13, lines 4 - 12.

5 There is nothing in the Chang reference to suggest a composite index formed by the
6 effects of two triggering actions, as required by claim 5.

7 With respect to claim 6, the newly added material that specifies that the weight value is
8 calculated from an algebraic formula is not found in either reference. Support is found
9 in Figure 9 and associated discussion.


10 Claim 8 defines in more detail the calculation of the weight value of a composite index
11 based on two trigger actions.

12 Claims 24 - 27 specify more detail of the calculation which, as discussed above, is not
13 taught by either reference.

14 Claims 28 - 34 are Beauregard claims that track the method claims they refer to.

15 For the foregoing reasons, allowance of the claims is respectfully solicited.

16 Respectfully submitted,
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